

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL MATTERS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS' POSITION IN
THE JOINT LETTER REGARDING GUS
FULDNER DEPOSITION**

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp, LLP, appointed Co-Lead and
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of
4 the State Bar of California and am admitted to practice before this Court. I make this declaration
5 based on my own personal knowledge. If called upon to testify, I could and would testify
6 competently to the truth of the matters stated herein.

7 2. Attached as **Exhibit A** is a true and correct copy of excerpts of the rough transcript
8 of the March 27, 2025 deposition of Gus Fuldner.

9 3. Attached as **Exhibit B** is a true and correct copy of a document introduced as
10 Exhibit 441 to the March 27, 2025 deposition of Gus Fuldner. A copy with the exhibit stamping is
11 not yet available.

12 4. Attached as **Exhibit C** is a true and correct copy of excerpts of the rough transcript
13 of the March 26, 2025 deposition of Gus Fuldner.

14 5. In preparing to depose Mr. Fuldner, my team reviewed the deposition of him taken
15 in *Boston Retirement System v. Uber Technologies, Inc., et al.*, No. 3:19-CV-06361-RS. The
16 *Boston Retirement* deposition did not narrow the necessary scope of Mr. Fuldner's deposition in
17 this matter.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed this 1st day of April, 2025 in Las Vegas, Nevada.

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21 /s/ Sarah R. London

22 Sarah R. London
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